

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

CIARA BOOTHE, on behalf of herself and all others similarly situated,)	
)	
)	
Plaintiff,)	
)	Case No.: 3:18-cv-00702
v.)	
)	JURY DEMAND
)	
ANDRADE'S CLEAN UP, INC., THE BEST TURN, INC. d/b/a ANDRADE'S CLEAN UP, and JORGE ANDRADE, individually,)	JUDGE CAMPBELL MAGISTRATE JUDGE HOLMES
)	
)	
Defendants.)	

**JOINT MOTION TO APPROVE SETTLEMENT AGREEMENT AND
DISMISS WITH PREJUDICE**

Plaintiff Ciara Boothe (“Named Plaintiff”), both on behalf of herself and the individuals who opted into this lawsuit (the “Opt-In Plaintiffs”) (collectively, the “Plaintiffs”), and Defendants Andrade’s Clean Up, Inc., The Best Turn, Inc. d/b/a Andrade’s Clean Up, and Jorge Andrade (collectively, the “Defendants”) respectfully submit this Joint Motion to Approve Settlement Agreement and Dismiss with Prejudice. For the reasons set forth in the accompanying order, the Settlement Agreement, attached as **Exhibit A**, is a fair and reasonable resolution of a bona fide dispute regarding Defendants’ alleged violations of the Fair Labor Standards Act. The Plaintiffs and Defendants therefore respectfully request the Court grant this Motion, approve the Settlement Agreement, and dismiss the case with prejudice.

Respectfully submitted,

/s/ Hunter A. Higdon

Hunter A. Higdon, BPR No. 035546
FLORIN GRAY BOUZAS OWENS, LLC
16524 Pointe Village Drive, Suite 100
Lutz, Florida 33558
hhigdon@fgbolaw.com

Attorney for Plaintiff

/s/ Megan Sutton

Mark A. Baugh, BPR No. 015779
Megan Sutton, BPR No. 029419
BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, PC
Baker Donelson Center
211 Commerce Street, Suite 800
Nashville, TN 37201
Telephone: (615) 726-5600
Facsimile: (615) 726-0464
mbaugh@bakerdonelson.com
msutton@bakerdonelson.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of June, 2019, a copy of the foregoing Joint Motion to Approve Settlement and Dismiss with Prejudice was filed electronically. Notice of this filing will be served by operation of the Court's electronic filing system to counsel for parties below. Counsel for parties may access these filings through the Court's electronic filing system:

Hunter A. Higdon, BPR No. 035546
FLORIN GRAY BOUZAS OWENS, LLC
16524 Pointe Village Drive, Suite 100
Lutz, Florida 33558
hhigdon@fgbolaw.com

Attorney for Plaintiff

/s/ Megan Sutton
Megan Sutton